

Exhibit A

**IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

RICHARD HORTON,	)	Case No. 23-cv-3888
	)	
<i>Plaintiff,</i>	)	
	)	Chief Judge Algenon L. Marbley
v.	)	
	)	
CITY OF COLUMBUS, <i>et al.</i> ,	)	Magistrate Judge Elizabeth P. Deavers
	)	
<i>Defendants.</i>	)	
	)	<b>JURY TRIAL DEMANDED</b>
	)	

**PLAINTIFF’S RULE 26(a)(1) DISCLOSURES**

Plaintiff Richard Horton, by his undersigned attorneys, hereby provides the following initial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1):

**1. Rule 26(a)(1)(A)(i) – Persons with knowledge:**

**Plaintiff Richard Horton** has knowledge of the events described in his Complaint, including his arrest, interrogation, wrongful prosecution, conviction, wrongful imprisonment, exoneration, and damages that he has suffered and continues to suffer. Plaintiff lives in Columbus, Ohio. Plaintiff may be contacted via Plaintiff’s counsel.

**Defendant Brenda K. Walker (Badge #1176)** may have knowledge concerning the investigation of the Loew street robbery; her contact and communications with other Defendants, with witnesses, with suspects, and with Plaintiff during the course of the investigation; the wrongful arrest, interrogation, prosecution, and conviction of Plaintiff; and Defendant Walker’s misconduct as alleged in the Complaint. She may also have knowledge of the policies and practices of the City of Columbus. Further, Defendant Walker will be able to testify regarding her personal assets and liabilities as it relates to punitive damages. Defendant may be contacted through her counsel.

**Defendant Sam Sias (Badge #1871)** may have knowledge concerning the investigation of the Loew street robbery; his contact and communications with other Defendants, with witnesses, with suspects, and with Plaintiff during the course of the investigation; the wrongful arrest, interrogation, prosecution, and conviction of Plaintiff; and Defendant Sias’s misconduct as alleged in the Complaint. Defendant Sias is deceased and will be represented in this action by his personal representative, Miekko Sias.

**Kiley Beale**, location unknown and investigation continues, may have information about Plaintiff's criminal proceedings and evidence disclosed during those proceedings, Plaintiff's criminal defense, investigation of the crimes at issue, the reversal of Plaintiff's conviction, Plaintiff's consistent declarations of innocence, as well as Plaintiff's wrongful prosecution and conviction and the resulting damages.

**Jordan Blake**, location unknown and investigation continues, may have information about Plaintiff's criminal proceedings and evidence disclosed during those proceedings, Plaintiff's criminal defense, investigation of the crimes at issue, the reversal of Plaintiff's conviction, Plaintiff's consistent declarations of innocence, as well as Plaintiff's wrongful prosecution and conviction and the resulting damages.

**Kim Curry**, location unknown and investigation continues, daughter of Rhonda Curry, may have information regarding the Loew Street robbery, the fabrication and suppression of evidence by Defendant Officers during the Loew Street robbery investigation, and her own contact with Defendant Officers.

**Rhonda Curry**, location unknown and investigation continues, may have information regarding the Loew Street robbery, the fabrication and suppression of evidence by Defendant Officers during the Loew Street robbery investigation, and her own contact with Defendant Officers.

**Shelli Curry**, location unknown and investigation continues, sister of Rhonda Curry, may have information regarding the Loew Street robbery, the fabrication and suppression of evidence by Defendant Officers during the Loew Street robbery investigation, and her own contact with Defendant Officers.

**Ricardo Diggs**, location unknown and investigation continues, may have information regarding the true perpetrator of the Loew Street robbery.

**Richard Diggs**, location unknown and investigation continues, may have information regarding the true perpetrator of the Loew Street robbery.

**Dwight Dorsey**, may have information about the damages that Plaintiff suffered and continues to suffer as a result of Defendants' misconduct. He may be contacted through Plaintiff's counsel.

**Mark Godsey**, mark.godsey@uc.edu, may have information about Plaintiff's criminal proceedings and evidence disclosed during those proceedings, Plaintiff's criminal defense, investigation of the crimes at issue, the reversal of Plaintiff's conviction, Plaintiff's consistent declarations of innocence, as well as Plaintiff's wrongful prosecution and conviction and the resulting damages.

**Sergeant Charles Greene (Badge #5143)**, location unknown and investigation continues, may have information about the police investigation that caused Plaintiff's wrongful prosecution and conviction, witness interviews, photo arrays, and false documents implicating Plaintiff in the crime, Plaintiff's criminal proceedings, and Defendants' misconduct as alleged in the Complaint.

**Alfred Harmon**, may have information about Plaintiff's wrongful prosecution, conviction, and incarceration, along with the damages that Plaintiff suffered and continues to suffer as a result. He may be contacted through Plaintiff's counsel.

**Janette Harmon-Horton**, may have information about Plaintiff's wrongful prosecution, conviction, and incarceration; Plaintiff's alibi; and the damages that Plaintiff suffered and continues to suffer as a result. She may be contacted through Plaintiff's counsel.

**Alissa Holfinger**, location unknown and investigation continues, may have information about Plaintiff's criminal proceedings and evidence disclosed during those proceedings, Plaintiff's criminal defense, investigation of the crimes at issue, the reversal of Plaintiff's conviction, Plaintiff's consistent declarations of innocence, as well as Plaintiff's wrongful prosecution and conviction and the resulting damages.

**LaKeon Horton**, may have information regarding the Loew Street robbery, the fabrication and suppression of evidence by Defendant Officers during the Loew Street robbery investigation, interactions between Plaintiff and Richard McClanahan, and the damages that Plaintiff suffered and continues to suffer as a result of Defendants' misconduct. He may be contacted through Plaintiff's counsel.

**Barbara Horton-Alomar**, may have information about Plaintiff's wrongful prosecution, conviction, and incarceration, along with the damages that Plaintiff suffered and continues to suffer as a result. She may be contacted through Plaintiff's counsel.

**Brian Howe**, howebc@uc.edu, may have information about Plaintiff's criminal proceedings and evidence disclosed during those proceedings, Plaintiff's criminal defense, investigation of the crimes at issue, the reversal of Plaintiff's conviction, Plaintiff's consistent declarations of innocence, as well as Plaintiff's wrongful prosecution and conviction and the resulting damages.

**Richard McClanahan**, location unknown and investigation continues, may have information regarding the Loew Street robbery, the fabrication and suppression of evidence by Defendant Officers during the Loew Street robbery investigation, and his own contact with Defendant Officers.

**Furquan McDougald**, may have information about Plaintiff's wrongful prosecution, conviction, and incarceration, along with the damages that Plaintiff suffered and continues to suffer as a result. He may be contacted through Plaintiff's counsel.

**Pamela Rhodeback (Badge #1915)**, location unknown and investigation continues, may have information about the police investigation that caused Plaintiff's wrongful prosecution and conviction, witness interviews, photo arrays, and false documents implicating Plaintiff in the crime, Plaintiff's criminal proceedings, and Defendants' misconduct as alleged in the Complaint.

**Todd Rhodeback (Badge #1501)**, location unknown and investigation continues, may have information about the police investigation that caused Plaintiff's wrongful prosecution and

conviction, witness interviews, photo arrays, and false documents implicating Plaintiff in the crime, Plaintiff's criminal proceedings, and Defendants' misconduct as alleged in the Complaint.

**Myron Schwartz**, deceased, may have information about Plaintiff's criminal proceedings and evidence disclosed during those proceedings, Plaintiff's criminal defense, investigation of the crimes at issue, the reversal of Plaintiff's conviction, Plaintiff's consistent declarations of innocence, as well as Plaintiff's wrongful prosecution and conviction and the resulting damages.

**Cynthia Searcy**, location unknown and investigation continues, may have information regarding the Loew Street robbery, the fabrication and suppression of evidence by Defendant Officers during the Loew Street robbery investigation, and her own contact with Defendant Officers.

**Det. Tom Seevers (Badge #1042)**, location unknown and investigation continues, may have information about the police investigation that caused Plaintiff's wrongful prosecution and conviction, witness interviews, photo arrays, evidence collection and processing, and false documents implicating Plaintiff in the crime, Plaintiff's criminal proceedings, and Defendants' misconduct as alleged in the Complaint.

**David Thomas**, location unknown and investigation continues, may have information about Plaintiff's criminal proceedings and evidence disclosed during those proceedings, Plaintiff's criminal defense, investigation of the crimes at issue, the reversal of Plaintiff's conviction, Plaintiff's consistent declarations of innocence, as well as Plaintiff's wrongful prosecution and conviction and the resulting damages.

**Mallorie Thomas**, location unknown and investigation continues, may have information about Plaintiff's criminal proceedings and evidence disclosed during those proceedings, Plaintiff's criminal defense, investigation of the crimes at issue, the reversal of Plaintiff's conviction, Plaintiff's consistent declarations of innocence, as well as Plaintiff's wrongful prosecution and conviction and the resulting damages.

**Carol Wright**, location unknown and investigation continues, may have information about Plaintiff's criminal proceedings and evidence disclosed during those proceedings, Plaintiff's criminal defense, investigation of the crimes at issue, the reversal of Plaintiff's conviction, Plaintiff's consistent declarations of innocence, as well as Plaintiff's wrongful prosecution and conviction and the resulting damages.

Plaintiff's investigation into this matter continues. Plaintiff reserves the right to modify and supplement this list as additional information becomes available. In addition, Plaintiff reserves the right to call at trial any witness disclosed by Defendants in this matter.

**2. Rule 26(a)(1)(A)(ii) – Documents to support claims:**

Plaintiff is in possession, custody, or control of the following documents, electronically stored information, and tangible things, which may be used to support Plaintiff's claims:

- Columbus Police Department reports
- Criminal trial transcripts
- DNA testing reports
- Documents relating to Plaintiff's post-conviction proceedings
- Documents relating to Richard Diggs and Ricardo Diggs's criminal history

Plaintiff's investigation into this matter continues. Plaintiff reserves the right to modify and supplement these documents as additional information becomes available.

**3. Rule 26(a)(1)(A)(iii) – Computation of damages:**

As a result of his wrongful prosecution and conviction, as well as nearly two decades spent in prison for a crime he did not commit, Plaintiff suffered and continues to suffer physical injuries, physical and emotional pain, psychological damage, anguish, humiliation, destruction of his reputation, loss of his young adulthood, disruption of his life and intimate and familial relationships, suspension of and interference with his ability to pursue a career, and deprivation of all of the basic pleasures of human experience, including the freedom to live one's life as an autonomous human being. Plaintiff also lost out on the opportunity to raise his children, one of whom has a serious heart condition that required multiple surgeries that he could not be present for. The years imprisoned are only a portion of Plaintiff's damages. Plaintiff's damages also include the time, including today, that Plaintiff continues to suffer as a direct result of his wrongful prosecution.

He seeks compensatory and punitive damages, as well as attorneys' fees and costs under 42 U.S.C. § 1988. At this time, Plaintiff has not made any computation of these damages. The jury will be tasked with quantifying these damages.

**4. Rule 26(a)(1)(A)(iv) – Insurance agreements:**

Plaintiff has no documents subject to disclosure under Federal Rule of Civil Procedure 26(a)(1)(A)(iv).

Respectfully submitted,

**RICHARD HORTON**

/s/ Alyssa Martinez  
*One of Plaintiff's Attorneys*

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**CERTIFICATE OF SERVICE**

I, Alyssa Martinez, an attorney, hereby certify that on February 5, 2024, I served the foregoing Plaintiff's Rule 26(a)(1) Disclosures upon all counsel of record via electronic mail.

/s/ Alyssa Martinez  
*One of Plaintiff's Attorneys*